Coast Guard Program
For Classifying
Oil Spill Removal Organizations

Program for Classifying Oil Spill Removal Organizations

Proposed Revision April 4, 2000

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Executive Summary

Section 4202 of the Oil Pollution Act of 1990 (OPA 90) amended section 311(j) of the Federal Water Pollution Control Act (FWPCA) to require the preparation and submission of response plans for all vessels defined as "tank vessels" under 46 U.S.C. 2101 and for certain oil-handling facilities. An owner or operator of such a tank vessel or facility is required to submit a response plan that, among other things, identifies and ensures by contract or other means approved by the President, the availability of private personnel and equipment necessary to remove, to the maximum extent practicable, a worst case discharge (including a discharge resulting from fire or explosion), and to mitigate or prevent a substantial threat of such a discharge.

The system for assembling, mobilizing, and controlling these resources is extremely complex. To meet the statutory requirements, each response plan must identify the means for accomplishing these tasks.

The Coast Guard created the voluntary Oil Spill Removal Organization (OSRO) classification program so that facility and tank vessel response plan holders could list OSROs in response plans in lieu of providing extensive detailed lists of response resources if "…the organization has been classified by the Coast Guard and their capacity has been determined to equal or exceed the response capability needed by the (plan holder)...". This was, and still is, the only regulatory benefit plan holders receive from utilizing Coast Guard classified OSROs. OSROs and plan holders participate and use the classification program on a strictly voluntary basis.

OSROs are classified based on “core equipment” that they own, contract for, or have arranged by other means. This core equipment includes boom, recovery, storage, and support equipment that includes response vessels and response personnel. The cooperation of OSROs, plan holders, and state and federal agencies has been essential to the development of a program which will allow all of us to better meet the intent of OPA 90.

We continue to stress that using a Coast Guard classified OSRO does not in any way relieve plan holders of the responsibility to ensure that their specific response needs are met. These newest classification guidelines provide a good indicator of an OSRO's response capability; however, they do not represent a "one size fits all" solution.

The thrust of OPA 90 is to develop private sector responsibility for all aspects of oil spill response planning. Realistic response capability is a crucial link in this process, so the emphasis on a comprehensive OSRO classification process is well placed. These guidelines will give planners a much better tool to use in gauging a classified OSRO's potential to meet specific planning requirements.

The OSRO classification process represents standard guidelines by which the Coast Guard and plan preparers can evaluate an Oil Spill Removal Organization's capability to respond to and recover oil spills of various sizes. Plan holders that arrange for the services of a Coast Guard classified OSRO do not have to list their specific response resources in their plans.

The classification information however, **DOES NOT GUARANTEE** the performance of an OSRO during an oil spill. Identifying a Coast Guard classified OSRO, as part of a tank vessel or

facility response plan submission, does not relieve plan holders of the primary responsibility to ensure their OSROs are able to respond effectively and to provide the complete range of capability required by the tank vessel or facility response plan regulations.

While these guidelines specifically apply to OSRO participating in the classification program, similar criteria will be used to assess the capability of OSRO's identified in response plans but not participating in the classification program.

Part I. Background

A. History

1. The OSRO Classification Guidelines were first published by the Coast Guard in 1992 to facilitate response plan development. Since the last significant revision in 1995, the guidelines have undergone subtle changes to accommodate various shortfalls that were identified by program managers and stakeholders alike. Thirteen separate newsletters were published announcing these changes, eight of which were incorporated into the last revision of the Guidelines in 1997. Since 1997, the guidelines have remained stable. OSRO classifications were intended strictly as a response "planning" tool that would allow plan writers to identify OSROs that could meet their response needs, as outlined by the regulations. In order to ensure, at a minimum, that an OSRO classification represents as accurately as possible an OSROs response capability, further revision to the guidelines was needed. This revision is designed to ensure that the intent of the planning regulations are better represented by each Coast Guard classification assigned.

2. Over the last five years, numerous stakeholders have provided feedback concerning such topics as "real" response times, as well as dedicated/non-dedicated and owned/contracted equipment and how this affects response capabilities. These types of issues, along with a few shortfalls that were identified in the previous guidelines compared to the underlying regulatory requirements to be met by plan holders, have been addressed in this revision. This revision also incorporates the "cap increase" for worst case discharge oil recovery and temporary storage capacity that became effective on April 5, 2000.

B. Purpose

1. The OSRO classification process was developed to facilitate the preparation and review of tank vessel and facility response plans. Section 4202 of the Oil Pollution Act of 1990 (OPA 90) amended section 311(j) of the Federal Water Pollution Control Act (FWPCA) to require the preparation and submission of response plans by the owner or operator of all vessels defined as "tank vessels" under 46 U.S.C. 2101 and for certain oil-handling facilities (hereafter referred to as plan holders).

2. The primary purpose of this program is to provide a systematic way to classify OSROs. Once classified, plan holders can list them by name and classification as an alternative to listing extensive resources in their tank vessel and facility response plans [Title 33 Code of Federal Regulations, Part 154.1035 (e)(3)(iii) and 33 CFR Part 155.1035 (i)(8)].

3. **An OSRO classification does not guarantee the performance of an OSRO nor does the use of a Coast Guard classified OSRO in a plan relieve plan holders of their ultimate statutory and regulatory responsibility to ensure the adequacy of the spill response resources identified in a response plan**.

C. Applicability

1. OSRO classification is a strictly voluntary process in which OSROs can participate and plan holders can utilize for planning purposes. An OSRO does not have to be classified and plan holders do not have to limit their response resources to Coast Guard classified OSROs. However, by participating in the program, an OSRO agrees to meet all program requirements. In addition, similar criteria will be used by the Coast Guard to evaluate the capability of OSRO's identified in response plans but not participating in the classification program.

D. Definitions

Average Most Probable Discharge (AMPD) means a discharge of the lesser of 50 barrels of oil or 1 percent of the volume of the worst case discharge for facilities, or 50 barrels of oil from the tank vessel during oil transfer operations to or from the tank vessel or facility.

Captain of the Port Zone (COTP Zone) means a zone specified in 33 CFR Part 3 and, for coastal ports, the seaward extension of that zone to the outer boundary of the Exclusive Economic Zone (EEZ).

Classification is a process for identifying the capability of oil spill removal organizations within specified geographic locations on the basis of their ownership or control of specialized equipment and trained personnel used in the removal of oil from the environment.

Containment Boom/Protective Boom are terms describing the intended use of the boom. The Tank Vessel and Facility Response Plan regulations require a plan holder to have available a specific amount of boom for shoreline protection purposes. The regulations require containment boom, used for recovery purposes, in addition to the specific protective boom requirements.

Contract means a written contractual agreement between the OSRO and their sub-contractors. The agreement must identify and **ensure** the availability of specified personnel and response equipment, within stipulated response times, in the specified geographic areas.

Dedicated Response Resources means equipment and personnel dedicated solely to oil spill response, cleanup, and spill containment. Such equipment and personnel are not utilized for any other activity that would adversely affect their ability to provide oil spill response services.

Effective Daily Recovery Capacity (EDRC) means the calculated capacity of oil recovery devices as determined by using a formula defined in 33 CFR Part 154, Appendix C and 33 CFR Part 155, Appendix B, that takes into account limiting factors such as daylight, weather, sea state, and emulsified oil in the recovered material.

Exclusive Economic Zone (EEZ) means the zone contiguous to the territorial sea of the United States, extending to a distance up to 200 nautical miles from the baseline from which the breadth of the territorial sea is measured.

Great Lakes means Lakes Superior, Michigan, Huron, Erie, and Ontario; their connecting and tributary waters; the Saint Lawrence River as far as Saint Regis; and adjacent port areas.

Higher Volume Port means the ports listed in 33 CFR Part 154.1020 and
Part 155.1020, including any water area within 50 nautical miles seaward of the port.

Inland Area means the area shoreward of the boundary lines (except in the Gulf of Mexico) defined in 46 CFR Part 7. In the Gulf of Mexico, it means the area shoreward of the line of demarcation (COLREG lines) as defined in Sections 80.740 - 80.850 of 33 CFR Chapter I. The inland area does not include the Great Lakes.

Letter of Intent means a document that identifies the personnel, equipment, and services capable of being provided by another commercial source to the oil spill removal organization within the stipulated response times in the specified geographic areas. It sets out the parties' acknowledgement that the commercial source **intends to commit** the resources in time of a response and that they agree to permit the Coast Guard to verify the availability of the identified response resources through tests, inspections, and exercises.

Maximum Most Probable Discharge (MMPD) means: (1) for a facility - a discharge of 1200 barrels or 10% of the volume of a Worst Case Discharge, whichever is less; (2) for a tank vessel with a capacity equal to or greater than 25,000 barrels of oil, a discharge of 2,500 barrels; or (3) for a tank vessel with a capacity of less than 25,000 barrels, a discharge of 10% of the tank vessel’s oil cargo capacity.

Nearshore Area means the area extending seaward 12 nautical miles from the boundary lines (except in the Gulf of Mexico) defined in 46 CFR Part 7. In the Gulf of Mexico, it means the area extending seaward 12 nautical miles from the line of demarcation (COLREG lines) as defined in Sections 80.740 - 80.850 of 33 CFR Chapter I.

Non-Dedicated Response Resources means response resources whose service is not limited exclusively to oil or hazardous substance spill response related activities.

Non-Persistent or Group I Oil means a petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions--

(1) At least 50% of which by volume, distill at a temperature of 340 degrees C (645 deg. F); and
(2) At least 95% of which by volume, distill at a temperature of 370 degrees C (700 deg. F).

Ocean means the open ocean, offshore area, and nearshore area as defined in this document.

Offshore Area means the area up to 38 nautical miles seaward of the outer boundary of the nearshore area (12-50 miles).

Oil Spill Removal Organization (OSRO) means any person or persons who own or otherwise control oil spill removal resources that are designed for, or are capable of, removing oil from the water or shoreline. Control of such resources through means other than ownership includes leasing or subcontracting of equipment or, in the case of trained personnel, by having contracts, evidence of employment, or consulting agreements. OSROs provide response equipment and services, individually or in combination with subcontractors or associated contractors, under contract or other means approved by the President, directly to an owner or operator of a tank vessel or facility required to have a response plan under 33 U.S.C. 1321(j)(5). OSROs must be able to mobilize and deploy equipment or trained personnel and remove, store, and transfer recovered oil. Persons such as sales and marketing organizations (e.g., distributorships and manufacturer's representatives) that warehouse or store equipment for sale are not OSROs.

Oil Pollution Risk Area (OPRA) means a location identified as having oil transportation activity or increased maritime traffic within a Captain of the Port (COTP) Zone, or a point along the coastline for measurement for the oceans environment coverage. OPRAs for each of the Captain of the Port Zones are listed in Appendix E. OPRAs are used to calculate OSRO classifications.

Open Ocean means the area seaward of the outer boundary of the Offshore area to the seaward boundary of the EEZ (50 - 200 miles).

Operating Area means Rivers and Canals, Inland, Great Lakes, Nearshore, Offshore, or Open Ocean. These terms are used to define the geographic location(s) in which a tank vessel or facility is handling, storing, or transporting oil. .

Operating Environment means Rivers and Canals, Inland, Great Lakes, or Ocean. These terms are used to define the conditions in which response equipment is designed to function.

Other Approved Means for the purposes of these guidelines means a Letter of Intent (LOI) as defined in this section.

Owned resources means equipment that belongs solely to the OSRO or personnel directly employed by the OSRO submitting an application for classification.

Persistent Oil means a petroleum-based oil that does not meet the distillation criteria for a non-persistent oil. For the purposes of this document, persistent oils are further classified based on specific gravity as follows:

- Group II - specific gravity less than .85.
- Group III - specific gravity between .85 and less than .95.
- Group IV - specific gravity .95 to and including 1.0.
- Group V - specific gravity greater than 1.0.

Response Resource Inventory (RRI) means the database of oil spill response resources developed by the Coast Guard to meet requirements of the Oil Pollution Act of 1990.

Response Resources means the personnel, equipment, supplies, and other capability necessary to

perform the response activities identified in a response plan.

Rivers and Canals means bodies of water confined within the inland area, including the Intracoastal Waterways and other waterways artificially created for navigation, that have a project depth of 12 feet or less.

Shallow Draft Capable means equipment is capable of operating in waters of six feet or less depth.

Temporary Storage Capacity (TSC) means inflatable bladders, rubber barges, certificated barge capacity, or other temporary storage that is capable of being utilized on scene at a spill response and which is designed and intended for storage of flammable or combustible liquids. It does not include tank vessels or barges of opportunity for which no pre-arrangements have been made. Fixed shore-based storage capacity, ensured available by contract or other approved means, will be acceptable in limited circumstances.

Tiers 1, 2, and 3 means the combination of response resources and the times within which the resources must be capable of arriving on scene to meet worst case discharge resource requirements as defined in 33 CFR Part 154.1020 and 33 CFR Part 155.1025.

Systems Approach means an assessment of the infrastructure and the support resources that an OSRO must have to mobilize, transport, deploy, sustain, and support the equipment resources necessary for the level of response for which classified i.e. response readiness, trained personnel, personnel recall mechanisms, trucks, trailers, response vessels, etc.

Worst Case Discharge (WCD) means in the case of an onshore facility and deepwater port, the largest foreseeable discharge in adverse weather conditions. In the case of a tank vessel, it means a discharge, in adverse weather conditions, of a tank vessel's entire oil cargo.

Part II. Description of Classifications

A. How are OSROs classified?

1. OSROs are classified based on the location of response resources and an assessment of the ability to mobilize those resources to designated points within a COTP Zone to meet the response times required for the average most probable discharge (AMPD), maximum most probable discharge (MMPD), and worst case discharge (WCD) tier 1, 2, and 3.

2. Classifications are grouped under Captain of the Port Zones by Oil Pollution Risk Areas (OPRAs) listed in Appendix E and include up to four environments (river/canals, oceans, inland, Great Lakes). The Coast Guard will also consider requests from OSROs for AMPD classifications at other locations they identify where vessel-to-vessel oil transfers are carried out.

B. Resource Requirements.

1. Core resources are separated into five categories: (1) containment/protective boom, (2) effective daily recovery capacity (EDRC) of oil recovery devices**, (3) temporary storage capacity (TSC), (4) personnel, and (5) response vessels. Boom is measured in feet. EDRC and TSC are measured in barrels per day.

**** EDRC credit will only by counted if there are response vessels identified to support the recovery devices that also meet the facility and tank vessel response plan time requirements outlined in these guidelines.**

2. The Coast Guard facility and tank vessel response plan regulations specify the quantity of these resources needed for specific planning volumes. The requirements are categorized as the average most probable discharge (AMPD), maximum most probable discharge (MMPD), and worst case discharges (WCD - divided into Tier 1, 2, and 3). AMPD, MMPD, and WCD are based on a calculation using the tank vessel's cargo volume or a facility's largest foreseeable oil discharge:

Table 1: Planning Volumes For Discharge Categories

Category	Planning Volumes	
	Facility	Tank Vessel
AMPD	50 barrels or 1% of WCD	
MMPD	1200 Bbls or 10% of WCD	2500 Bbls or 10% of WCD
WCD	Largest foreseeable oil discharge	Entire loss of oil cargo

3. The OSRO Classification Program uses a combination of the planning volume capacities and other information found in the response plan regulations to classify OSROs. For the OSRO program, the classifications of A, M, W1, W2, and W3 are equivalent to AMPD, MMPD, and WCD (Tier 1, 2, and 3).

4. Manufacturers design boom, oil recovery devices, and TSC equipment with certain operating environments in mind. In the response plan regulations, these are identified as Inland, Rivers and Canals, Great Lakes, and Oceans environments. Therefore, the OSRO Classification program classifies OSROs based on these environments. Appendix A lists specific requirements for boom, EDRC, and TSC for each of these environments.

5. Tables 2A-2C below specify boom, EDRC, and TSC quantities in order to receive an A, M, W1, W2, or W3 classification. An OSRO must meet all the boom, EDRC and TSC amounts to obtain a single classification, and each classification is determined separately for each operating environment.

Table 2A: Boom Amounts In Feet For OSRO Classifications

Environment	Configuration	A*	M	W1	W2	W3
Rivers/Canals	Protective Containment	1000 1000	4000 4000	25000 5000	25000 5000	25000 5000
Great Lakes	Protective Containment	1000 1000	6000 6000	30000 15000	30000 22500	30000 30000
Inland	Protective Containment	1000 1000	6000 6000	30000 15000	30000 22500	30000 30000
Oceans	Protective Containment	1000 1000	8000 8000	30000 15000	30000 22500	30000 30000

*** Any combination of 2,000 ft of protective/containment boom is acceptable.**

Table 2B: EDRC Amounts In Barrels Per Day

Environment	A	M	W1	W2	W3
Rivers/Canals	50	1250	1875	3750	7500
Great Lakes	50	1250	6250	12500	25000
Inland	50	1250	12500	25000	50000
Oceans	50	1250	12500	25000	50000

Table 2C: TSC Amounts In Barrels Per Day

Environment	A	M	W1	W2	W3
Rivers/Canals	100	2500	3750	7500	15000
Great Lakes	100	2500	12500	25000	50000
Inland	100	2500	25000	50000	100000
Oceans	100	2500	25000	50000	100000

6. Resources owned, contracted, or arranged by other means.

   a. The tank vessel and facility response plan regulations require plan holders to ensure the availability of response resources by contract or other approved means. OSROs must meet these same requirements for all resources (dedicated, non-dedicated, owned, and non-owned equipment and personnel) that they claim for classification purposes. At a minimum, this requires a Letter of Intent from the owner of a resource.

7. Dedicated vs. non-dedicated resources.

   a. OSRO's may identify either dedicated or non-dedicated resources to obtain a classification. However, since non-dedicated resources may not be immediately available to respond, longer notification/mobilization times will be assigned to these resources to account for their possible non-availability (see detailed discussion in paragraph II.C.4. below) Since, non-dedicated tank barges used for TSC credit may operate significant distances from their classification resource sites, an OSRO must further ensure the availability of non-dedicated barges by contract or other approved means in quantities equal to twice what the OSRO requires of the dedicated resources.

8. Counting resources towards classification (owned, contracted, or arranged by other means, dedicated, and non-dedicated)

   a. Resources at sites identified for an A classification must be capable of arriving and being deployed at the site of oil transfer operations within 1 hour (boom) or 2 hours (oil recovery devices and temporary storage capacity) of the detection of a spill during transfer operations (except resources for A classifications for transfers in the offshore and open ocean environments must be capable of being enroute to the transfer location within 1 hour of the detection of a spill). Only resources located at equipment sites capable of being mobilized and enroute to the scene of a spill within 2 hours of

notification will be counted toward M and W1 classifications. Because of the potential for non-dedicated resources to be committed to other functions, only dedicated resources are presumed to be able to mobilize within these time requirement. Any type resource will be allowed for W2 and W3 classification.

9. Personnel requirements.

    a. The numbers of personnel needed to support a response depends upon numerous factors and cannot be easily measured. For purposes of the OSRO Classification Program, the number of personnel required for a classification at each OPRA will be based on the resource sites used to gain a classification for the OPRA. During the application process an OSRO must identify the number of personnel required to mobilize and operate the resources at each of their resource sites. Each site that meets the time requirements for a classification will have its personnel requirements totaled for that classification. If sufficient personnel have been identified by the OSRO that meet the response time requirements and can concurrently deploy and operate all the equipment necessary for that level of classification, then an OSRO will qualify for that classification.

10. Response vessel requirements.

    a. Response vessels are integral in every response. Vessels intended for response services must be clearly identified in the application process. Although response vessels are not programmatically calculated into a classification, a review of available response vessels will be done by the NSFCC and if a shortfall is perceived, further discussion with the OSRO will be warranted before a classification is considered. Only response vessels that meet the response time requirements outlined in these guidelines by tier, will be considered. All response vessels identified must meet applicable US Coast Guard regulations and policy guidelines.

11. Counting fixed storage.

    a. Fixed storage tankage ashore can be identified to meet the TSC requirements in limited circumstances. Fixed tankage will be acceptable only for OSRO classifications covering the River and Canals, Inland, and Great Lakes operating environments. Fixed tankage will be allowed for up to 35% of an OSROs TSC for these operating environments provided that the OSRO certifies that they can transport recovered oil to the fixed tankage ashore and sustain the required EDRC. No fixed tankage will be allowed in the Oceans Environment classifications.

12. Vacuum trucks and EDRC/TSC interrelationship

    a. Vacuum truck(s) will not be permitted for TSC and EDRC credit in the "oceans" environment unless an OSRO can provide the proper documentation from the cognizant COTP authorizing the on deck transport of a vehicle(s) with EDRC and TSC capability.

13. TSC/EDRC interrelationship.

    a. An OSRO must identify TSC equaling twice the EDRC included in a classification application. An OSRO's classification is limited by the lowest rated component of the recovery system. For example, if an OSRO has a EDRC of 10,000 Bbls/day, but only has an ensured available TSC of 14,000 Bbls/day, then its recovery capacity is limited to 7,000 Bbls/day (one half of the available TSC capability).

C. Response Times

1. In addition to resource quantities, OSROs are required to meet certain response times. The response times for classification were derived from the regulations and standardized for classification through a series of workshops. There are two major categories of response times - tank vessels and facilities – due to the differences between the respective tank vessel and facility response plan regulations. Additionally, if a COTP Zone contains a higher volume port (see definitions section), response times are more stringent. Table 3 summarizes response times for facilities (Fac), tank vessels (Vsl), facility higher volume ports (FHVP), and tank vessel higher volume ports (VHVP).

2. An OSRO must ensure that the resources outlined in Tables 2A-2C are able to meet the response times specified in Table 3 in order to receive a classification for a specific OPRA.

Table 3: Response Times In Hours For Boom, EDRC, and TSC Resources

Environment	A	M	W1	W2	W3
Rivers &Canals	**Boom 1hr EDRC/TSC 2 hrs**	**Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs**	**Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs**	**Fac 36 hrs Vsl 48 hrs FHVP 30 hrs VHVP 36 hrs**	**Fac 60 hrs Vsl 72 hrs FHVP 54 hrs VHVP 60 hrs**
Great Lakes	**Boom 1hr EDRC/TSC 2 hrs**	**Fac 6 hrs Vsl 12 hrs FHVP N/A VHVP N/A**	**Fac 12 hrs Vsl 18 hrs FHVP N/A VHVP N/A**	**Fac 36 hrs Vsl 42 hrs FHVP N/A VHVP N/A**	**Fac 60 hrs Vsl 66 hrs FHVP N/A VHVP N/A**
Inland	**Boom 1hr EDRC/TSC 2 hrs**	**Fac 12 hrs Vsl 24 FHVP 6 hrs VHVP 12 hrs**	**Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs**	**Fac 36 hrs Vsl 48 hrs FHVP 30 hrs VHVP 36 hrs**	**Fac 60 hrs Vsl 72 hrs FHVP 54 hrs VHVP 60 hrs**
Oceans	**Boom 1hr EDRC/TSC 2 hrs See Note**	**Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs**	**Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs**	**Fac 36 hrs Vsl 48 hrs FHVP 30 hrs VHVP 36 hrs**	**Fac 60 hrs Vsl 72 hrs FHVP 54 hrs VHVP 60 hrs**

Note: "A" classifications for the offshore and open ocean environments must identify boom and EDRC/TSC capable of being enroute the transfer location within 1 hour of discharge discovery.

3. How response times are computed.

    a. The response plan regulations require the owner or operator to include time for notification, mobilization, and travel time when computing response times. The Classification program calculates response times by combining the notification / mobilization times and travel times of the resource sites used for a particular classification.

4. Resource notification/mobilization time.

   a. The time to notify and mobilize resources at a site is largely based on how much control the OSRO has over those resources. If a resource is owned by an OSRO, the OSRO has high control. If they are contracted, or arranged by other means, the OSRO has less control. The amount of control also depends on whether the resource is dedicated or non-dedicated. Dedicated resources are more likely to have a quicker notification/mobilization time than those that are non-dedicated since these resources will not be committed to other activities and are more readily available. Therefore, resource sites that are owned and dedicated are presumed to be more capable of mobilizing faster than those that are contracted and non-dedicated. For this reason, different mobilization times will be used for calculating OSRO classifications based on resource status (see Table 4).

   b. OSROs will also be required to provide information on the status of each of their response resources during the application process. By using Table 4 below, an OSRO will determine the Notification/Mobilization Response Time for each response resource included in their application.

Table 4: Notification/Mobilization Response Times (Hours)

Resource Status	Response Personnel Availability	
	On site (OS)	Recall (R)
Owned/Dedicated (O/D)	1 HR	2 HRS
Contract/Dedicated (C/D)	1.5 HRS	2.5 HRS
LOI/Dedicated (LOI/D)	2 HRS	3 HRS
Owned/Non-Dedicated (O/ND)	2.5 HRS	3.5 HRS
Contract/Non-Dedicated (C/ND)	3 HRS	4 HRS
LOI/Non-Dedicated (LOI/ND)	3.5 HRS	4.5 HRS

Notes:

- **Full time personnel are a dedicated resource**
- **Part time personnel are a non -dedicated resource**
- **On site means a 24 hour staffed resource site.**
- **Available upon recall means personnel recalled on beeper or phone tree.**
- **LOI as defined in Definitions section of guidelines.**
- **Table includes .5 HRS between discovery of discharge and notification of the OSRO**

5. Computing travel times

   a. Travel times are computed using standard speeds, as noted below, and the highway or water distance (normally a circuitous route) between an OSRO site and specified geographic locations within the COTP Zone. Latitude and longitude identify both the OSRO sites and the geographic locations. The geographic location on which the classification is calculated is either a Captain of the Port (COTP) city, Oil Pollution Risk Area (OPRA), or a position 50 miles offshore from either when calculating an

"oceans" classification. The choice of the geographic locations (COTP City, OPRA) depends on the Captain of the Port Zone the OSRO desires to obtain a classification in. The 50-mile point is specific for the Oceans environment and is measured seaward from the COTP City or coastal OPRA. As previously noted, because of the stringent response times, classifications for AMPD coverage in other locations requested by an OSRO where vessel-to-vessel oil transfers are carried out will be determined on a case by case basis.

b. Travel speeds of 35 miles per hour for land and 5 knots for water are used for OSRO classification calculations. These values are from the response plan regulations. The distance is divided by the speed to determine the travel time as outlined below:

$$\text{Travel Time} = \frac{\text{distance between OSRO site and OPRA/COTP city}}{\text{35 mph or 5 kts}}$$

6. Computing Site Response Times

a. The total response time assigned to each site is the sum of the notification/mobilization and travel time to specific OPRAs.

D. Prince William Sound Classifications

1. The tank vessel and facility response plan regulations establish more stringent planning criteria for owners and operators of tank vessels loading cargo at a facility permitted under the Trans-Alaska Pipeline Authorization Act. OSROs intending to respond to this area will also be classified to that standard. Additional requirements concerning pre-positioned equipment caches are also found in 33 CFR Part 154 Subpart G and Part 155, Subpart E.

E. Shallow Water Requirements

1. Depending on the operating environment, a certain percentage of OSRO resources must be capable of operating in waters of 6 feet or less [33 CFR Part 154.1045(e)(5) and 33 CFR Part 155.1050 (f)(6)]. The OSRO Guidelines combine the nearshore environment with the offshore and open ocean environment, therefore, the more stringent criteria of 20% shallow water capable, has been adopted for all environments. OSRO's that apply for special classification limited to the offshore and open ocean environments will be addressed on a case by case basis. Equipment identified in an OSRO application to meet this requirement must be suitable for operating in shallow water. Appendix A identifies specific sizes for containment and protection boom.

F. OSRO Exercises

1. Both the tank vessel and facility response plan regulations require that the plan holder conduct annual equipment deployment exercises involving the OSROs listed in their response plans. Although the responsibility for ensuring these exercises occur rests with the plan holder, an OSRO who is listed as the primary response organization in a response plan desiring to obtain and maintain a classification must participate in and keep documentation of completion of these exercises. While the National Preparedness for

Response Exercise Program (PREP) Guidelines published in August 1994 contain a detailed description of the exercise requirements, the following summarizes the specifics applying to OSROs:

a. For each site included in an OSROs application for classification, an annual equipment deployment exercise must involve a representative sampling of equipment from the site, and the personnel that would normally operate or supervise the operation of that equipment.

b. Per the PREP guidelines, the representative sampling of equipment to be exercised each year must include at least 1000 feet of each type of boom and one of each type of oil recovery device at each site.

c. OSROs with multiple sites that are managed as regional facilities may be able to consolidate some equipment deployment exercises per the PREP guidelines. Such exercises may involve equipment from one or more sites within a region, but personnel from each site must participate in the exercise to meet the guidelines. OSROs that operate using regional facilities must define the regional boundaries and sites included in each region in their application for classification. An example of an acceptable "region" would be the area that includes the New England states. This region might be called the "northeast region". An unacceptable region, for purposes of these guidelines, might be the "East Coast Region", such as Maine to Florida, due to its size.

d. For OSROs using a combination of owned and contracted resources to meet the requirements for classification, the exercises must include both categories of resources working together and integrating separate system components provided by multiple OSROs.

e. Exercises must be held in each environment where an OSRO holds a valid classification using equipment appropriate for the environment. For OSROs holding classifications for both the “inland” and “rivers and canals” operating environments, an exercise in either environment will meet this requirement.

f. In addition to equipment deployment, exercises should also include the mobilization, transportation, and logistics support aspects, especially as it relates to AMPD, MMPD, and WCD Tier 1 resources.

2. Records of an OSRO’s participation in exercises (or records that document equivalent spill response experience per the PREP guidelines) must be maintained for three years from the date of an exercise or spill and be available for review during OSRO verification visits. OSRO’s shall note in their initial classification application where these records will be located and available for inspection.

G. Training of Personnel

1. The tank vessel and facility response plan regulations require plan holders to ensure that response personnel are trained to perform their jobs as listed in the plans (33 CFR Part 154.1045 and 33 CFR Part 155.1055). The OSRO Classification Program requires an

OSRO to provide similar assurance. This information need not be a course syllabus but enough explanation must be provided to demonstrate that an OSRO has identified key skills needed in a response and show that the personnel have received the proper training to perform in those areas. An OSRO should also describe the methods in which the training will be delivered to their personnel. An effective response training program should include, but is not limited to:

⇒ Actions to take in accordance with designated job responsibilities.
⇒ Health and safety hazards
⇒ OSHA requirements outlined in 29 CFR 1910.120
⇒ Communications
⇒ Training on specific response equipment identified in the OSRO application
⇒ Material Safety Data Sheet (MSDS) use

2. Training must be conducted periodically to reinforce the required knowledge.

3. Training records shall be maintained for three years following the completion of the training. Their location shall be noted in the initial classification application and all records must be available for review during OSRO verification visits.

H. Equipment Maintenance

1. An OSRO must ensure that response resources listed in their application are periodically inspected and maintained in good operating condition, in accordance with the manufacturer's recommendations and best commercial practices.

2. All inspections and maintenance must be documented and the records maintained for three years. Their location shall be noted in the initial classification application and all records must be available for review during OSRO verification visits.

Part III. The Classification Program

A. Application Process

1. Any OSRO may apply for classification. The program is voluntary. An OSRO must first contact the National Strike Force Coordination Center (NSFCC) for application materials and instructions. The address and phone number for the NSFCC are:

Commanding Officer
National Strike Force Coordination Center
Attn: OSRO Section
1461 North Road Street
Elizabeth City, NC 27909-3241
Tel: (252) 331-6000 / Fax: (252) 331-6012

2. The OSRO will be required to fill out the pre-formatted computer disc that will be included in the application package. The Coast Guard uses the Response Resource Inventory (RRI) computer program to help determine compliance with the resource levels

and response times. Classification is assigned based on the information supplied by each OSRO. Participation in the RRI is mandatory for an OSRO to receive classification. Using response times and discharge quantities specified in the facility and tank vessel response plan regulations (33 CFR Parts 154 and 155), and using equipment requirements as specified in the regulations and this document, the NSFCC determines the appropriate classification(s) for each OPRA requested by an OSRO. The Coast Guard will also consider requests from OSROs for AMPD classifications at other locations they identify where vessel-to-vessel oil transfers are carried out. In order for an application to be accepted, all pertinent data fields must be completed on the RRI disc.

3. The OSRO must also provide a written narrative outlining the logistics requirements for each site used in the application. This information would be best presented by using the Resource Site(s) Worksheet in Appendix D, however any format may be used. The narrative must provide enough information to document that an OSRO has considered the myriad and complex logistics support requirements for the mobilization and delivery of the response equipment from each resource site to each OPRA requested. The narrative should contain, but is not limited to:

   - Methods of personnel recall (if applicable)
   - Methods of loading resources for mobilization
   - Methods of resource transport off site to incident or OPRA staging area
   - Methods of mobilizing, deploying, and supporting resources at the OPRA requested
   - Special response resources staging (ie: pre-packaging, palletizing, pre-loaded)
   - Necessary site support services (ie: tractors, trailers, drivers, cranes, etc.)

4. In addition to the computer disc and the logistics narratives, the OSRO must also provide an attestment letter. The letter must include, at a minimum, that the application is accurate and factual to the best of their knowledge and that they comply with the resource maintenance, personnel training, and the exercise requirements outlined in the guidelines. It must also state that they have all the support components needed to deploy the core equipment and the logistics network needed to sustain the resources at an incident for the time periods specified in the response plan regulations (examples of support components include personnel, boats, anchors, hoses, lines, etc.). This attesting letter must also include a statement agreeing to allow the Coast Guard to visit their resource sites for the purposes of verifying the information in the application and their compliance with the provisions of these guidelines. An example of an acceptable attestment statement, with the required information, is shown in Appendix C.

B. Alternative Compliance Methods

1. OSROs may request the Coast Guard to consider alternative standards to the ones presented in this document. The request must be submitted in writing to the NSFCC.

2. The alternative standards for compliance that will be considered are those allowed within the tank vessel and facility response plan regulations. These are:

Table 5: Acceptable Alternative Standards and Regulatory Cites

Category	Section in Response Plan Regulations	
	Facility 33 CFR Part 154	Tank Vessels 33 CFR Part 155
EDRC	Appendix C, Section 6.3	Appendix B, Section 6.3
Travel Speed	Appendix C, Section 2.6	Appendix B, Section 2.6
Temporary Storage Capacity	Appendix C, Section 9.2	Appendix B, Section 9.2
Boom	No cite - COTP discretion	.1065(f)

3. Additionally, OSROs may request approval for alternative response time standards (notification, mobilization, and travel time). The OSRO will be required to complete the detailed Resource Sites Worksheet provided in Appendix D in order to support the request.

C. Review Process

1. An applicant's resources, narratives, and attesting letter - provided as a completed application package - will be reviewed and evaluated for classification by the OSRO Section of the NSFCC. Incomplete packages will be returned for completion.

2. As part of the review of an application, the NSFCC will consult with the applicable COTP(s) where an OSRO is requesting classification.

3. After the review is completed, the Commanding Officer of the NSFCC will issue a classification letter to an applicant. Included in the letter will be a classification profile that provides information on classification levels and coverage. An example classification profile is provided in Table 6.

4. If an OSRO does not agree with the classifications determined by the NSFCC, they may request a reconsideration of the classification decision. If the NSFCC does not adequately address their concern, an OSRO can submit a written appeal to the OSRO Program Manager at Coast Guard Headquarters. The appeal should be as specific as possible. The letter should be sent to:

Commandant (G-MOR-3)
2100 Second St. SW
Washington, DC 20593-0001.

Table 6: OSRO Profile Example **COTP Zone: New York**
OSRO: XYZ **Oil Pollution Risk Area: New York**

		RIVERS AND CANAL RESOURCES		GREAT LAKES RESOURCES		INLAND RESOURCES		OCEAN RESOURCES	
		Owned	Contractd	Owned	Contractd	Owned	Contractd	Owned	Contractd
A	BOOM	1500	500	1500	500	1500	500	1500	500
	EDRC	25	25	25	25	25	25	25	25
	TSC	50	50	50	25	50	50	50	50
	PERSONNEL	12	17	12	17	12	35	12	120
		Classified		Not Classified		Classified		Classified	
M	BOOM	6000	2000	10000	2000	10000	2000	12000	2000
	EDRC	1000	250	1000	250	1000	250	1000	250
	TSC	1500	1000	1500	1000	1500	1000	1500	1000
	PERSONNEL	12	17	12	17	12	35	12	120
		Classified		Classified		Classified		Not Classified	
W 1	BOOM	25000	10000	30000	15000	30000	15000	15000	15000
	EDRC	1000	875	6000	250	12000	500	12000	500
	TSC	3000	750	10000	2500	20000	5000	20000	5000
	PERSONNEL	12	17	12	17	12	35	12	180
		Not Classified		Classified		Classified		Classified	

Note: W2 and W3 tiers not represented.

Part IV. Verifications

A. Verification Process

1. The Coast Guard will visit each site that an OSRO has included in an application to conduct a resource verification visit after a classification letter has been issued. A standard checklist will be used to conduct the verification. The purpose of the visit is to:

   a. verify the resources identified in the application,
   b. complete a visual survey of the material condition of the response resources,
   c. ensure the response resources are properly maintained and maintenance documented,
   d. ensure the OSRO has sufficient personnel available and trained to mobilize, deploy, and operate the equipment identified in the OSRO application, that personnel meet the Hazardous Waste Operations and Emergency Response (HAZWOPER) requirements in 29 CFR Part 1910.120, and that such is documented,
   e. verify a cross section of the inventory for systems operability and logistics support capability,
   f. review records of participation in exercises, and
   g. review the site's logistics narrative (where applicable) and determine the status of the support services listed in the narrative (ie. equipment rentals, commercial drivers, and personnel services, etc.) and their ability to mobilize and sustain the resources there.

2. To determine whether the OSROs resource amounts are consistent with the classification level, the Coast Guard will conduct a cross check of the OSROs resource amounts to those required by the appropriate classification level.

3. When completing the visual equipment survey, the Coast Guard will examine a number of

equipment systems from each of the response resource categories that reflects a cross section of the inventory on site. The examination will key on whether the equipment is working and deployable. An OSRO is expected to ensure that all systems that count toward classification are in working order and able to be deployed into the marine environment. The OSRO may be required to operate one or more systems for the inspectors **. If the system(s) does not have all its parts or cannot operate, the Coast Guard may allow the OSRO to retain its classification, so long as the deficiency does not significantly affect the OSRO's overall response readiness. The Coast Guard will however, examine additional systems. If those systems fail the inspection, the Coast Guard will consider this sufficient evidence to indicate a trend in response resource deficiency and immediately reduce or revoke the OSROs classification. An OSRO will than have 14 days to correct the deficiency, at which time the Coast Guard may conduct a second OSRO site verification to determine whether to restore the original classification.
(**If the scope of the verification deployment is equal to that required by the PREP Guidelines for an equipment deployment, an OSRO may gain credit toward that requirement if all other criteria are met.)

4. The inspectors will review the OSRO's maintenance program to ensure that the equipment is properly maintained. The verification team may consider, among other conditions, the following:

(1) Booms:

(a) Overall condition
(b) Evidence of ownership, lease, or subcontract
(c) Manufacturer, type, and quantity
(d) Compatibility of connectors
(e) Number and adequacy of anchors
(f) Transportability
(g) Planned operating environment(s)

(2) Recovery Devices (skimmers and vacuum trucks):

(a) Evidence of ownership, lease, or subcontract
(b) Manufacturer, type, model, and throughput capacity
(c) Compatibility of components (hoses, suction and skimmer head, couplings, connectors, etc.)
(d) Operability and maintenance
(e) Condition of the prime mover and other supporting equipment
(f) Holding capacity
(g) Planned operating environment(s)

(3) Oil Spill Response Vessels (Skimmers, barges, and support craft)

(a) Evidence of ownership, lease, or subcontract
(b) Operability and maintenance
(c) Storage capacity
(d) Inspection/Certification
(e) Planned operating environments
(f) Grade of oil carried

(g) Off-load capability
(h) Length, beam, draft, range, transit speed, crew size

(4) Temporary Storage Devices:

(a) Evidence of ownership, lease, or subcontract
(b) Manufacturer, type, model (as applicable)
(c) Capacity (twice the daily capacity of recovery devices)
(d) Inspected and maintained in accordance with manufacturer's recommendations
(e) Contracted barges with current certificates
(f) Planned operating environments
(g) Grade of oil carried
(h) Location of fixed storage

(5) Boats:

(a) Sufficient numbers of trailers, outboard motors, and USCG-required safety equipment (life jackets, lights, etc.)
(b) Types and number of boats appropriate to the environment of the classification
(c) Operability and maintenance
(d) Length, beam, draft, range, transit speed, crew size
(e) Adequate working platform for oil spill response
(f) Certification/registration

(6) Records:

(a) Equipment clearly marked for identification
(b) Records supporting claims of ownership, lease, or subcontract
(c) Complete maintenance records reflecting condition of the equipment
(d) Personnel training records
(e) Exercise records

5. The Coast Guard will verify through documentation, discussions and informal interviews that all response personnel at the site are trained in accordance with 29 CFR 1910.120 and the OSROs internal training program. Prior to the Coast Guard's visit, the OSRO should check personnel records and subcontracting or consulting agreements to verify the number and availability of trained personnel listed in the application.

6. An OSRO who disagrees with the results of a verification visit may appeal in writing to the Commanding Officer of the NSFCC within 30 days of the visit. If the OSRO remains unsatisfied with the determination after the appeal, a second appeal may be made to Coast Guard Headquarters (see Part III, Section C.4 for contact information).

7. After consultation with the cognizant COTP(s), classifications can be revoked or altered by the Commanding Officer of the NSFCC. Some reasons for revoking or altering a classification include:

- Resources identified in an OSRO application could not be verified.
- Available response resources do not match the classification levels.
- Response resources were unable to meet response times or did not function properly during drills, exercises, responses, and/or inspections.

- Failure of the OSROs to meet the training, maintenance, and exercise provisions of these guidelines.

B. Re-verifications

1. After the initial verification visit, OSROs will undergo a periodic re-exam. Each OSRO site will be visited at least once every 3 years.

2. Re-inspections may also occur at shorter time intervals for the following reasons:

   - unsatisfactory verification visit,
   - request from Coast Guard Captain of the Port,
   - poor performance by the OSRO during spill or exercises,
   - OSRO request,
   - change in ownership, or
   - other reasons.

Part V. Additional Program Requirements

A. Notice of Change in Capability

1. Once classified, an OSRO shall notify, within 24 hours, the NSFCC and each COTP affected about significant changes in their response resources that might alter their classification or reduce their ability to respond to a spill as planned. A "significant" change is defined as a reduction in the OSRO's classified capacity by a factor of 10% for a period of 48 hours or longer. If an OSRO is involved in a protracted response and their resources will not be available to respond to another incident, they must provide to the NSFCC a method to "backfill" the resources deployed as necessary to meet the minimum criteria for their current classification.

B. Annual Validation

1. Each OSRO issued a classification letter by the NSFCC shall annually review and verify that the resource information submitted for the original classification remains accurate and the equipment maintenance, personnel training, and exercises have been completed. On completion of this review, the OSRO shall submit documentation to the NSFCC stating that the annual review has been done. If any resource, maintenance, or training changes have occurred, an OSRO shall provide this information to the NSFCC so that their classifications can be updated as appropriate.

APPENDIX A

Specific Classification Standards by Operating Environment

RIVER AND CANALS ENVIRONMENT

The minimum equipment standards and the maximum response times for classifying OSROs for planned response to spills in a rivers and canals environment are listed below and summarized in Tables 2A, 2B, and 2C. All equipment to be used in this environment must be capable of operating in one-foot wave heights. Additional boom requirements are:

Boom height (inches, draft plus freeboard) - 6-18
Shallow water boom height (inches, draft plus freeboard) $\leq$12

Reserve Buoyancy to Weight Ratio - 2:1

Total Tensile Strength (lbs) - 4500

Skirt Fabric Tensile Strength (lbs) - 200

Skirt Fabric Tear Strength (lbs) - 100

a. Class A - 50 Bbls/day Recovery

(1) Containment/Protective boom: 2,000 feet total.

(2) Oil recovery equipment (skimmers, vacuums, etc.): 50 Bbl/day of effective daily recovery capacity.

(3) Recovered oil storage: 100 Bbls of temporary storage capacity.

(4) Boom deployment response time: 1 hour.

(5) Oil recovery equipment and temporary storage response time: 2 hours.

b. Class M - 1,250 Bbl/day Recovery

(1) Containment boom: 4,000 feet.

(2) Protective boom: 4,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 1,250 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 2,500 Bbls of temporary storage capacity.

(5) Facility response times: 6 hours for higher volume ports; all other locations 12 hours.

(6) Vessel response times: 12 hours for higher volume ports; all other locations 24 hours.

c. Class W1 - 1,875 Bbl/day Recovery

(1) Containment boom: 12,500 feet.

(2) Protective boom: 25,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 1,875 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 3,750 Bbls of temporary storage capacity.

(5) Facility response times: 6 hours for higher volume ports; all other locations 12 hours.

(6) Vessel response times: 12 hours for higher volume ports; all other locations 24 hours

d. Class W2 - 3,750 Bbl/day Recovery

(1) Containment boom: 20,000 feet.

(2) Protective boom: 25,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 3,750 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 7,500 Bbls of temporary storage capacity.

(5) Facility response times: 30 hours for higher volume ports; all other locations 36 hours.

(6) Vessel response times: 36 hours for higher volume ports; all other locations 48 hours.

e. Class W3 - 7,500 Bbl/day Recovery

(1) Containment boom: 27,500 feet.

(2) Protective boom: 25,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 7,500 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 15,000 Bbls of temporary storage capacity.

(5) Facility response times: 54 hours for higher volume ports; all other locations 60 hours.

(6) Vessel response times: 60 hours for higher volume ports; all other locations 72 hours.

GREAT LAKES ENVIRONMENT

The minimum equipment standards and the maximum response times for classifying an OSRO for planned response to spills in a Great Lakes environment are listed below and summarized in

Tables 2A, 2B, and 2C. All equipment to be used in this environment must be capable of operating in four-foot wave heights. Additional boom requirements are:

Boom height (inches, draft plus freeboard) - 18-42
Shallow water boom height (inches, draft plus freeboard) ≤ 24

Reserve Buoyancy to Weight Ratio - 2:1

Total Tensile Strength (lbs) - 15-20,000

Skirt Fabric Tensile Strength (lbs) - 300

Skirt Fabric Tear Strength (lbs) - 100

a. Class A - 50 Bbls/day Recovery

(1) Containment/Protective boom: 2,000 feet total.

(2) Oil recovery equipment (skimmers, vacuums, etc.): 50 Bbl/day of effective daily recovery capacity.

(3) Recovered oil storage: 100 Bbls of temporary storage capacity.

(4) Boom deployment response time: 1 hour.

(5) Oil recovery equipment and temporary storage response time: 2 hours.

b. Class M - 1,250 Bbls/day Recovery

(1) Containment boom: 6,000 feet.

(2) Protective boom: 6,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 1,250 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 2500 Bbls of temporary storage capacity.

(5) Facility response times: 6 hours.

(6) Vessel response times: 12 hours.

c. Class W1 - 6,250 Bbls/day Recovery

(1) Containment boom: 15,000 feet.

(2) Protective boom: 30,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 6,250 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 12,500 Bbls of temporary storage capacity.

(5) Facility response times: 12 hours.

(6) Vessel response times: 18 hours.

d. Class W2 - 12,500 Bbls/day Recovery

(1) Containment boom: 22,500 feet.

(2) Protective boom: 30,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 12,500 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 25,000 Bbls of temporary storage capacity.

(5) Facility response times: 36 hours.

(6) Vessel response times: 42 hours.

e. Class W3 - 25,000 Bbls/day Recovery

(1) Containment boom: 30,000 feet.

(2) Protective boom: 30,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 25,000 Bbls/day of effective daily recovery capacity.

(4) Recovered oil storage: 50,000 Bbls of temporary storage capacity.

(5) Facility response times: 60 hours.

(6) Vessel response times: 66 hours.

INLAND ENVIRONMENT

The minimum equipment standards and the maximum response times for classifying an OSRO for planned response to spills in an inland environment are listed below and summarized in Tables 2A, 2B, and 2C. All equipment to be used in this environment must be capable of operating in three-foot wave heights. Additional boom requirements are:

Boom height (inches, draft plus freeboard) - 18-42
Shallow water boom height (inches, draft plus freeboard) $\leq$ 24

Reserve Buoyancy to Weight Ratio - 2:1

Total Tensile Strength (lbs) - 15-20,000

Skirt Fabric Tensile Strength (lbs) - 300

Skirt Fabric Tear Strength (lbs) - 100

a. Class A - 50 Bbl/day Recovery

(1) Containment/Protective boom: 2,000 feet total.

(2) Oil recovery equipment (skimmers, vacuums, etc.): 50 Bbl/day of effective daily recovery capacity.

(3) Recovered oil storage: 100 Bbls of temporary storage capacity.

(4) Boom deployment response time: 1 hour.

(5) Oil recovery equipment and temporary storage response time: 2 hours.

b. Class M - 1,250 Bbls Recovery

(1) Containment boom: 6,000 feet.

(2) Protective boom: 6,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 1,250 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 2,500 Bbls of temporary storage capacity.

(5) Facility response times: 6 hours for higher volume ports; all other locations 12 hours.

(6) Vessel response times: 12 hours for higher volume ports; all other locations 24 hours.

c. Class W1 - 12,500 Bbl/day Recovery

(1) Containment boom: 15,000 feet.

(2) Protective boom: 30,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 12,500 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 25,000 Bbls/day of temporary storage capacity.

(5) Facility response times: 6 hours for higher volume ports; all other locations 12 hours.

(6) Vessel response times: 12 hours for higher volume ports; all other locations 24 hours.

d. Class W2 - 25,000 Bbls/day Recovery

(1) Containment boom: 22,500 feet.

(2) Protective boom: 30,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 25,000 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 50,000 Bbls of temporary storage capacity.

(5) Facility response times: 30 hours for higher volume ports; all other locations 36 hours.

(6) Vessel response times: 36 hours for higher volume ports; all other locations 48 hours.

e. Class W3 - 50,000 Bbl/day Recovery

(1) Containment boom: 30000 feet.

(2) Protective boom: 30,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 50,000 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 100,000 Bbls of temporary storage capacity.

(5) Facility response times: 54 hours for higher volume ports; all other locations 60 hours.

(6) Vessel response times: 60 hours for higher volume ports; all other locations 72 hours.

OCEANS ENVIRONMENT

The minimum equipment standards and the maximum response times for classifying an OSRO for planned response to spills in an oceans environment (includes nearshore, offshore, and open ocean) are listed below and summarized in Table 2A, 2B, and 2C. With the exception of shoreline protection boom, all equipment to be used in this environment must be capable of operating in six-foot wave heights. Additional containment boom requirements are:

Boom height (inches, draft plus freeboard) - ≥42
Shallow water boom height (inches, draft plus freeboard) 18- 36

Reserve Buoyancy to Weight Ratio - 3:1 to 4:1

Total Tensile Strength (lbs) - > 20,000

Skirt Fabric Tensile Strength (lbs) - 500

Skirt Fabric Tear Strength (lbs) - 125

Reserve Buoyancy to Weight Ratio - > 2:1

Total Tensile Strength (lbs) - > 15,000

Skirt Fabric Tensile Strength (lbs) - > 300

Skirt Fabric Tear Strength (lbs) - > 100

a. Class A - 50 Bbl/day Recovery

(1) Containment/Protective boom: 2,000 feet total.

(2) Oil recovery equipment (skimmers, vacuums, etc.): 50 Bbl/day of effective daily recovery capacity.

(3) Recovered oil storage: 100 Bbls of temporary storage capacity.

(4) Boom deployment response time: 1 hour (beyond 12 miles from nearest shoreline, 1 hour plus travel time from shore).

(5) Oil recovery equipment and temporary storage response time: 2 hours (beyond 12 miles from nearest shoreline, 1 hour plus travel time from shore).

b. Class M - 1,250 Bbls Recovery

(1) Containment boom: 8,000 feet (response time to 50 miles seaward of the COTP city is calculated only for 4000 feet; other 4000 feet calculated to shoreside classification point).

(2) Protective boom: 8,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 1,250 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 2,500 Bbls of temporary storage capacity.

(5) Facility response times: 6 hours for higher volume ports; all other locations 12 hours.

(6) Tank vessel response times: 12 hours for higher volume ports; all other locations 24 hours (for open ocean, plus travel time from shore).

c. Class W1 - 12,500 Bbl/day Recovery

(1) Containment boom: 15,000 feet (response time to 50 miles seaward of the COTP city is calculated only for 7500 feet; other 7500 feet calculated to shoreside classification point).

(2) Protective boom: 15,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 12,500 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 25,000 Bbls/day of temporary storage capacity.

(5) Facility response times: 6 hours for higher volume ports; all other locations 12 hours.

(6) Tank vessel response times: 12 hours for higher volume ports; all other locations 24 hours (for open ocean, plus travel time from shore).

d. Class W2 - 25,000 Bbls/day Recovery

(1) Containment boom: 22,500 feet (response time to 50 miles seaward of the COTP city is calculated only for 8250 feet; other 14,250 feet calculated to shoreside classification point).

(2) Protective boom: 15,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 25,000 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 50,000 Bbls of temporary storage capacity.

(5) Facility response times: 30 hours for higher volume ports; all other locations 36 hours.

(6) Tank vessel response times: 36 hours for higher volume ports; all other locations 48 hours (for open ocean, plus travel time from shore).

e. Class W3 - 50,000 Bbls/day Recovery

(1) Containment boom: 30,000 feet (response time to 50 miles seaward of the COTP city is calculated only for 11000 feet; other 19,000 feet calculated to shoreside classification point).

(2) Protective boom: 15,000 feet.

(3) Oil recovery equipment (skimmers, vacuums, etc.): 50,000 Bbl/day of effective daily recovery capacity.

(4) Recovered oil storage: 100,000 Bbls of temporary storage capacity.

(5) Facility response times: 54 hours for higher volume ports; all other locations 60 hours.

(6) Tank vessel response times: 60 hours for higher volume ports; all other locations 72 hours (for open ocean, plus travel time from shore).

APPENDIX B

Guideline Tables

Table 1: Planning Volumes for Discharge Categories

Category	Facility	Tank Vessel
AMPD	50 barrels or 1% of WCD	
MMPD	1200 Bbls or 10% of WCD	2500 Bbls or 10% of WCD
WCD	Largest foreseeable oil discharge	Entire loss of oil cargo

Table 2A: Boom Amounts in Feet for OSRO Classifications

Environment	Configuration	A*	M	W1	W2	W3
Rivers/Canals	Protective Containment	1000 1000	4000 4000	25000 5000	25000 5000	25000 5000
Great Lakes	Protective Containment	1000 1000	6000 6000	30000 15000	30000 22500	30000 30000
Inland	Protective Containment	1000 1000	6000 6000	30000 15000	30000 22500	30000 30000
Oceans	Protective Containment	1000 1000	8000 8000	30000 15000	30000 22500	30000 30000

*** Any combination of 2,000 ft of protective/containment boom is acceptable**

Table 2B: EDRC Amounts In Barrels Per Day

Environment	A	M	W1	W2	W3
Rivers/Canals	50	1250	1875	3750	7500
Great Lakes	50	1250	6250	12500	25000
Inland	50	1250	12500	25000	50000
Oceans	50	1250	12500	25000	50000

Table 2C: TSC Amounts In Barrels Per Day

Environment	A	M	W1	W2	W3
Rivers/Canals	100	2500	3750	7500	15000
Great Lakes	100	2500	12500	25000	50000
Inland	100	2500	25000	50000	100000
Oceans	100	2500	25000	50000	100000

Appendix B

Table 3: Response Times In Hours For Boom, EDRC, and TSC Resources

Environment	A	M	W1	W2	W3
Rivers &Canals	Boom 1hr EDRC/TSC 2 hrs	Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs	Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs	Fac 36 hrs Vsl 48 hrs FHVP 30 hrs VHVP 36 hrs	Fac 60 hrs Vsl 72 hrs FHVP 54 hrs VHVP 60 hrs
Great Lakes	Boom 1hr EDRC/TSC 2 hrs	Fac 6 hrs Vsl 12 hrs FHVP N/A VHVP N/A	Fac 12 hrs Vsl 18 hrs FHVP N/A VHVP N/A	Fac 36 hrs Vsl 42 hrs FHVP N/A VHVP N/A	Fac 60 hrs Vsl 66 hrs FHVP N/A VHVP N/A
Inland	Boom 1hr EDRC/TSC 2 hrs	Fac 12 hrs Vsl 24 FHVP 6 hrs VHVP 12 hrs	Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs	Fac 36 hrs Vsl 48 hrs FHVP 30 hrs VHVP 36 hrs	Fac 60 hrs Vsl 72 hrs FHVP 54 hrs VHVP 60 hrs
Oceans	Boom 1hr EDRC/TSC 2 hrs See Note	Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs	Fac 12 hrs Vsl 24 hrs FHVP 6 hrs VHVP 12 hrs	Fac 36 hrs Vsl 48 hrs FHVP 30 hrs VHVP 36 hrs	Fac 60 hrs Vsl 72 hrs FHVP 54 hrs VHVP 60 hrs

Note: "A" classifications for the offshore and open ocean environments must identify boom and EDRC/TSC capable of being enroute the transfer location within 1 hour of discharge discovery.

Table 4: Notification/Mobilization Response Times (Hours)

Resource Status	Response Personnel Availability	
	On site (OS)	Recall (R)
Owned/Dedicated (O/D)	1 HR	2 HRS
Contract/Dedicated (C/D)	1.5 HRS	2.5 HRS
LOI/Dedicated (LOI/D)	2 HRS	3 HRS
Owned/Non-Dedicated (O/ND)	2.5 HRS	3.5 HRS
Contract/Non-Dedicated (C/ND)	3 HRS	4 HRS
LOI/Non-Dedicated (LOI/ND)	3.5 HRS	4.5 HRS

Notes:

- **On site means a 24 hour staffed resource site.**
- **Full time personnel are a dedicated resource**
- **Part time personnel are a non -dedicated resource**
- **Available upon recall means personnel recalled on beeper or phone tree.**
- **LOI as defined in definitions section of guidelines.**
- **Table includes .5 HRS between discovery of discharge and notification of the OSRO**

Appendix B

Table 5: Acceptable Alternative Standards and Regulatory Cites

Category	Section in Response Plan Regulations	
	Facility 33 CFR Part 154	Tank Vessels 33 CFR Part 155
EDRC	Appendix C, Section 6.3	Appendix B, Section 6.3
Travel Speed	Appendix C, Section 2.6	Appendix B, Section 2.6
Temporary Storage Capacity	Appendix C, Section 9.2	Appendix B, Section 9.2
Boom	No cite - COTP discretion	.1065(f)

Table 6: OSRO Profile Example

COTP Zone: New York

OSRO: XYZ

Oil Pollution Risk Area: New York

	RIVERS AND CANAL RESOURCES		GREAT LAKES RESOURCES		INLAND RESOURCES		OCEAN RESOURCES	
	Owned	Contractd	Owned	Contractd	Owned	Contractd	Owned	Contractd
A BOOM	1500	500	1500	500	1500	500	1500	500
EDRC	25	25	25	25	25	25	25	25
TSC	50	50	50	25	50	50	50	50
PERSONNEL	12	17	12	17	12	35	12	120
	Classified		Not Classified		Classified		Classified	
M BOOM	6000	2000	10000	2000	10000	2000	12000	2000
EDRC	1000	250	1000	250	1000	250	1000	250
TSC	1500	1000	1500	1000	1500	1000	1500	1000
PERSONNEL	12	17	12	17	12	35	12	120
	Classified		Classified		Classified		Not Classified	
W BOOM	25000	10000	30000	15000	30000	15000	15000	15000
EDRC	1000	875	6000	250	12000	500	12000	500
TSC	3000	750	10000	2500	20000	5000	20000	5000
1 PERSONNEL	12	17	12	17	12	35	12	180
	Not Classified		Classified		Classified		Classified	
W BOOM	25000	20000	30000	22500	30000	22500	15000	22500
EDRC	3000	750	6000	6500	12000	500	12500	12500
TSC	7000	500	20000	5000	40000	10000	40000	10000
2 PERSONNEL	12	17	12	17	12	35	12	180
	Classified		Classified		Not Classified		Classified	
W BOOM	25000	27500	30000	20000	30000	30000	15000	24000
EDRC	7000	500	20000	5000	40000	10000	40000	10000
TSC	10000	5000	40000	10000	90000	10000	90000	10000
3 PERSONNEL	12	180	12	180	12	180	12	180
	Classified		Not Classified		Classified		Not Classified	

APPENDIX C

Sample Attestment Statement

I, the undersigned, attest to the fact that to the best of my knowledge, the response resource information contained in this application is accurate and factual. This company and all of the subcontractors identified in this application maintains, inspects, and operates the response equipment in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance is documented and the records are maintained for three years. Company response personnel and all of the subcontractors identified in this application, including volunteers when used, are sufficiently trained, in accordance with Occupational Safety and Health Administration (OSHA) standards for emergency response operations in 29 CFR 1910.120 and to operate the equipment included in this application. These records are maintained for a period of no less than three years. This company and all of the subcontractors identified in this application meets or exceeds the exercise requirements as outlined in the PREP guidelines for each plan in which it is listed and that documentation to this effect is maintained for three years and is available for verification. We also agree to be visited by Coast Guard personnel for the purpose of verifying the information contained therein.

Appendix D

Resource Site Worksheet

1.OSRO	2. Submitted By Phone	3. Date

4. OPRA	5. COTP Zone	7. Classification Tier TimeRrequirements						
		6. Environment	Vessels	A	M	W1	W2	W3
			Facility					

8. Site Location	9. Resource	10. Resource Status	11. Assigned Notification/ Mobilization Time	12. Circuitous Distance to OPRA	13. Travel Speed	14. Time to travel	15. Total Response Time

16. Comments / Narrative

1. Company name and OSRO Number8.
2. Submitted By and Phone
3. Date:
4. OPRA
5. COTP Zone:
6. Environment:
7. Classification Tier Time Rrequirements: as per guidelines
8. Site Location: indicate the city where the site is located
9. Name or type of resource (by groups)
10. Site Status: use table 4 in guideline to determine status
11. Assigned Notification and /Mobilization time: use table 4 in guidelines
12. Circuitous Distance to OPRA
13. Travel Speed: use 35 mph for land or 5 kts for water
14. Time to travel block block 12 divided by block 13
15. Total Response Time block 14 + block 11

16. Comments / Narrative:
Provide additional information that may assist in evaluating each site's response readiness. Include personnel recall methods, resource staging methods (i.e.: palletization/packaging), availability of transport vehicles (owned/contracted), and the resource mobilization and deployment support service requirements for the site as well as the OPRA requested.

Appendix D

SAMPLE Resource Site Worksheet (Sample)

1.OSRO	2. Submitted By	3. Date
Rinelli's Rangers	Phone Bob Rinelli	3-24-00

4. OPRA	5. COTP Zone	7. Time Requirements (hrs)		A	M	W1	W2	W3
Albany, NY	Activities New York	6. Environment INLAND	Vessels	1	24	24	48	72
			Facility	1	12	12	36	60

8. Site Location	9. Resource	10. Resource Status	11. Assigned Notification-Mobilization Time	12. Circuitous Distance to OPRA	13. Travel Speed	14. Time to travel	15. Total Response Time
Poughkeepsie, NY	Boom	O/D-OS	1hr	70 miles	35	2 hrs	3 hrs
	EDRC	O/ND-OS	2.5 hrs	70 miles	35	2 hrs	4.5 hrs
	TSC	O/ND-OS	2.5 hrs	70 miles	35	2 hrs	4.5 hrs
Schenectady, NY	Personnel	C/ND-R	4 hrs	15 miles	35	.3 hrs	4.3 hrs
Kingston, NY	Vessels	O/ND-OS	3.5 hrs	50 miles	5	10 hrs	13.5 hrs
New York, NY	Boom	O/D-OS	1 hr	140 miles	35	4 hrs	5 hrs
	Vessels	C/ND-OS	3.0 hrs	140 miles	5	28 hrs	31 hrs
	EDRC	C/ND-R	4 hrs	140 miles	35	4 hrs	8 hrs
	TSC	C/ND-R	4 hrs	140 miles	35	4 hrs	8 hrs
	Personnel	C/D-OS	1.5 hrs	140 miles	35	4 hrs	5.5 hrs

16. Comments - Narrative

All equipment at each site is pre packaged or palletized. All boom at each site is palletized. Each site identified has sufficient heavy equipment to load all resources on locally contracted tractor-trailers.

Poughkeepsie site will use LOI with ABC Trucking to move equipment and provide drivers.

Schenectady site has tractor-trailer available on site with designated drivers.

Kingston site will use Olsens trucking to move equipment. No LOI in place but none required due to consistent availability.

New York site is proximate to numerous trucking companies so no LOI exist for any one company.

OPRA site will use Taylor Rental of Albany for heavy equipment mobilization requirement. LOI in place. Addition concerns such as launching locations, tides and currents, personnel support (room and board) has been considered.

1. Company name and OSRO Number
2. Submitted By and Phone
3. Date:
4. OPRA:
5. COTP Zone:
6. Environment:
7. Classification Tier Time Requirements: as per guidelines
8. Site Location: indicate the city where the site is located
9. Name or type of resource (by groups)
10. Site Status: use table 4 in guideline to determine status
11. Assigned Notification and Mobilization time: use table 4 in guidelines
12. Circuitous Distance to OPRA:
13. Travel Speed: use 35 mph for land or 5 kts for water
14. Time to travel: block 12 divided by block 13
15. Total Response Time: block 14 + block 11

16. Comments - Narrative:
Provide additional information that may assist in evaluating each site's response readiness. Include personnel recall methods, resource staging methods (i.e.: palletization-packaging), availability of transport vehicles (owned, contracted), and the resource mobilization and deployment support service requirements for the site as well as the OPRA requested.

APPENDIX E

Oil Pollution Risk Areas

COTP Zone	OPRA	State
Anchorage	Adak	AK
Anchorage	Bethel	AK
Anchorage	Dutch Harbor	AK
Anchorage	Homer	AK
Anchorage	Kodiak	AK
Anchorage	Kotzebue	AK
Anchorage	Nikiski	AK
Anchorage	Nome	AK
Anchorage	Prudhoe Bay	AK
Anchorage	Red dog mine	AK
Anchorage	Squaw Harbor	AK
Baltimore	Baltimore	MD
Baltimore	Ocean City	MD
Baltimore	Point Lookout	MD
Boston	Boston	MA
Buffalo	Buffalo	NY
Buffalo	Erie	PA
Buffalo	Massena	NY
Buffalo	Oswego	NY
Charleston	Charleston	SC
Charleston	Myrtle Beach	SC
Chicago	Chicago	IL
Cleveland	Cleveland	OH
Corpus Christi	Brownsville	TX
Corpus Christi	Corpus Christi	TX
Corpus Christi	Port Comfort	TX
Duluth	Ashland	WI
Duluth	Duluth	MN
Guam	Guam	GU
Guam	Rota	MP
Guam	Saipan	MP
Guam	Tinian	MP
Hampton Roads	Cape Hatteras	NC
Hampton Roads	Norfolk	VA
Hampton Roads	Richmond	VA
Honolulu	Hilo	HI
Honolulu	Honolulu	HI
Honolulu	Kahului	HI
Honolulu	Lihue	HI
Honolulu	Samoa	HI

COTP Zone	OPRA	State
Houston	Houston	TX
Houston	Texas City	TX
Huntington	Huntington	WV
Huntington	Marietta	OH
Jacksonville	Jacksonville	FL
Jacksonville	Port Canaveral	FL
Juneau	Yakutat	AK
Juneau	Juneau	AK
Juneau	Ketchikan	AK
Juneau	Sitka	AK
Los Angeles / LB	Long Beach	CA
Los Angeles / LB	Santa Barbara	CA
Long Island Sound	New Haven	CT
Louisville	Cincinnati	OH
Louisville	Evansville	IN
Louisville	Louisville	KY
Memphis	Little Rock	AR
Memphis	Memphis	TN
Miami	Key West	FL
Miami	Miami	FL
Miami	Port St. Lucie	FL
Milwaukee	Green Bay	WI
Milwaukee	Milwaukee	WI
Mobile	Mobile	AL
Mobile	Pensacola	FL
Morgan City	Morgan City	LA
Morgan City	Intercoastal City	LA
New Orleans	Baton Rouge	LA
New Orleans	New Orleans	LA
New Orleans	Venice	LA
New York	Albany	NY
New York	New York City	NY
Paducah	Cape Girardeau	MO
Paducah	Decatur	AL
Paducah	Nashville	TN
Paducah	Paducah	KY
Philadelphia	Cape May	NJ
Philadelphia	Marcus Hook Anch	PA
Pittsburgh	Monessaen	PA
Port Arthur	Port Arthur	TX
Portland (ME)	Bucksport	ME
Portland (ME)	Portland	ME
Portland (OR)	Astoria	OR
Portland (OR)	Coos Bay	OR
Portland (OR)	Portland	OR

COTP Zone	OPRA	State
Providence	Providence	RI
Puget Sound	Ferndal	WA
Puget Sound	Neah Bay	WA
Puget Sound	Seattle	WA
Saint Louis	La Crosse	WI
Saint Louis	Moline	IL
Saint Louis	Quincy	IL
Saint Louis	Saint Louis	MO
San Diego	San Diego	CA
San Diego	Lightering Zone	CA
San Francisco	Alameda	CA
San Francisco	Crescent City	CA
San Francisco	Eureka	CA
San Francisco	Monterey	CA
San Juan	Charlotte Amalie	USVI
San Juan	Guayanilla	PR
San Juan	Limetree	USVI
San Juan	San Juan	PR
San Juan	St. Croix	USVI
Sault Ste. Marie	Alpena	MI
Sault Ste. Marie	Escanaba	MI
Sault Ste. Marie	Marquette	MI
Sault Ste. Marie	Traverse City	MI
Savannah	Savannah	GA
Tampa	Bocagrande	FL
Tampa	Tampa	FL
Toledo	Toledo	OH
Valdez	Prince William Sound	AK
Wilmington	Morehead City	NC
Wilmington	Wilmington	NC